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last entrance manhole at the SWBT central office or tandem switch location, and provide sufficient length of fiber optic cable for SWBT to pull the fiber optic cable to the SWBT cable vault for termination on the SWBT fiber distribution frame. SWBT will be responsible for designing, provisioning, ownership and maintenance of all equipment and facilities on its side of the network interconnection point ("NIP"). Similarly, the CLEC will be responsible for the same functions on its side of the NIP. Each party is free to select the manufacturer of its Fiber Optic Terminal (FOT). (STC Appendix NIM Pages 1-4; ACS, Dobson, Interprise and Sprint Appendix NIM Sec. 1.A; AT&T Appendix NIM Sec. 1; Brooks, Intermedia and USLD Appendix NIM Pages 1-2; Cox Appendix MSFI Sec. 2)

12. The CLEC location will include fiber optic terminals, multiplexing equipment, and fiber required to take the optical signal from SWBT for trunking or transport of unbundled loop traffic.

The fiber connection point may occur at several locations:

- A location with an existing SWBT fiber termination panel. In this situation, the NIP shall be outside the SWBT building which houses the fiber termination panel.
- A location with no existing SWBT fiber termination panel. In this situation, SWBT and the CLEC shall negotiate provision, maintenance, and ownership of a fiber termination panel and an above-ground outside cabinet as a NIP and for connection of the fiber cables.
- A manhole outside the SWBT central office or tandem switch location. In this situation the CLEC would provide sufficient length of fiber optic cable for SWBT to pull the fiber

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optic cable to the SWBT cable vault for termination on the SWBT fiber distribution frame ("FDF"). The NIP will be at the manhole and SWBT will assume ownership and maintenance responsibility for the fiber cabling from the manhole to the FDF.

The SWBT central office or tandem switch location will include all SWBT fiber optic terminals, multiplexing, and fiber required to take the optical signal hand-off provided by the CLEC for trunking. This location is SWBT's responsibility to provision and maintain. (STC Appendix NIM Page 2; ACS, Dobson, Interprise and Sprint Appendix NIM Sec. 1.D and 1.E; AT&T Appendix NIM Sec. 1.4 and 1.5; Brooks and USLD Appendix NIM Page 2; Cox Appendix MSFI Sec. 2.3.2 and 2.3.3)

13. Any or all of the above methods of interconnection will be available at the trunk side of the local switch, the trunk connection points of a tandem switch, central office cross-connect points, out-of-band signaling transfer points, and points of access to unbundled network elements. SWBT provides requesting CLECs options for interconnection at all of these points. 47 C.F.R. § 51.305(a)(2) (STC Sec. II.B.4; ACS, AT&T, Brooks, Dobson, Intermedia, Interprise, Sprint and USLD Appendices NIM and ITR)
14. The FCC Rules also require the availability of interconnection at the line-side of a local switch. Paragraphs 210 and 211 of the FCC Order provide that an example of this type of interconnection would be at the Main Distribution Frame (MDF) in the central office and would be useful for CLECs that have their own distribution plant and seek to interconnect to an incumbent's switch. SWBT has not yet received any requests for such a form of interconnection, but will make it available upon request. 47 C.F.R. § 51.305(a)(2)(i) (STC Sec. II.B.4)

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15. Where space permits, CLECs will be allowed to arrange for Physical Collocation of equipment in SWBT buildings and structures to terminate cables on their own equipment located in secure areas separated from SWBT's equipment area. SWBT has developed methods and procedures for the termination of copper and fiber cables into a collocation space. No request for termination of coaxial cables or microwave facilities have been received in Oklahoma. SWBT will accept request for such terminations under the Bona Fide Request process. A space preparation charge will be assessed for constructing the secure space, and the CLEC will be able to install, operate, and maintain its equipment within that space. Arrangements will be made for the installation of cross-connections to SWBT unbundled loop facilities and trunking to other SWBT offices. In addition, SWBT will permit the placement of facilities to allow collocating carriers to connect to the facilities of other collocating carriers within the same central office. A CLEC may use these facilities for the same purposes described in the discussion of MSFI. 47 U.S.C. § 251(c)(6) and 47 C.F.R. § 51.321(e); § 51.323(a), (h), (i) (STC Sec. II.B.2 and Appendix NIM; ACS, Brooks and USLD Appendix NIM; Cox and Enterprise Appendix Physical Collocation; AT&T and Dobson Appendix Collocation). A copy of SWBT's *Interconnector's Technical Publication for Physical Collocation* is attached to the affidavit of Mr Auinbauh.
16. The collocating CLEC may physically locate any equipment used for interconnection or access to unbundled network elements in the secured space. 47 C.F.R. § 51.323(b) (STC, Appendix NIM) Under this arrangement, or other stipulated agreements, a CLEC may locate remote switching modules that do not provide enhanced services in SWBT

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buildings. 47 C.F.R. § 51.323(c) (Brooks Sec. II.B.5; Intermedia Sec. II.B.6; and USLD Sec. II.B.4)

17. SWBT will provide to a CLEC at the CLEC's request, on a first-come, first-served basis, physical collocation under the same terms and conditions available to similarly situated carriers at the time of such request and in a manner consistent with SWBT's Tariffs. (STC Appendix NIM page 6 Sec. 1.2; AT&T Appendix Collocation Sec. 2.4
18. Where space is not available for Physical Collocation, or upon request of the CLEC, SWBT will offer the Virtual Collocation interconnection option in accordance with the existing SWBT Tariff F.C.C. Number 73, Section 25, "Expanded Interconnection", in central office and tandem buildings and transmission huts and controlled environment vaults consistent with ¶ 826 of the FCC Order. Where the CLEC owns or leases its fiber, the CLEC would install fiber optic cable to the entrance manhole of the SWBT tandem or end office and provide sufficient additional cable for SWBT to pull the cable into a cable vault. SWBT will splice the CLEC's fiber cable to a riser tail and fiber termination shelf assembly. The CLEC also has the option of ordering dedicated transport facilities from SWBT for termination in equipment located in the virtual collocation arrangement. The CLEC may designate the type and brand of fiber optic or electronic termination equipment to be installed by SWBT in the central office. SWBT will install, operate and maintain this equipment. SWBT will at a minimum, install, maintain, and repair collocated equipment within the same time periods and with failure rates that are no greater than those that apply to the performance of similar functions for the same types of equipment used by SWBT itself. The facilities installed under this option can be used for interoffice trunking between the CLEC and SWBT and for access to unbundled network components. These virtual

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collocation facilities may also be used for special or switched access. 47 C.F.R. § 51.323(a), (e) (STC Sec. II.B.1; ACS, Cox, ICG and Interprise Sec. 4.3.2; Brooks and Intermedia Sec. II.B.2; USLD Sec. II.B.1)

19. With either Physical Collocation or Virtual Collocation, SWBT provides an interconnection point or points, physically accessible by both SWBT and the requesting CLEC, at which the fiber optic cables carrying the CLEC's circuits enter SWBT's premises. 47 C.F.R. § 51.323(d)(1) The CLEC may use at least two such interconnection points at each of SWBT's premises at which there are at least two entry points for the requesting CLEC's facilities and space is available for new facilities at those entry points. 47 C.F.R. § 51.323(d)(2) (STC Appendix NIM - Physical Collocation Agreement Article VI; SWBT Tariff No. 73, Sec. 25.2.1 (B); AT&T Appendix Collocation Sec. 8.1; ACI, Brooks, and USLD Appendix NIM - Physical Collocation Sec. 6; Cox, Dobson and Interprise Appendix Physical Collocation Agreement Sec. 6)
20. The facilities that are collocated in SWBT premises may be used to interconnect to SWBT Unbundled Network Elements. (47 C.F.R. §51.323(g)) (STC Appendix NIM - Physical Collocation Agreement Sec. 7.1 and Appendix UNE Sec. 2.1; AT&T Appendix Collocation Sec. 10.1; ACS, Brooks and USLD Appendix NIM - Physical Collocation Sec. 7.1; Cox, Dobson and Interprise Physical Collocation Agreement Sec. 7.1) The same collocation space may be used for access to UNEs, provisioning of exchange access and interexchange access.
21. To the extent required by FCC rules or orders (47 C.F.R. §51.323(j)) the CLEC shall be permitted at its election to contract for the preparation of the SWBT premises for its collocation arrangement (construction of the cage within the secured collocation area) with

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contractors approved by SWBT. (STC Appendix NIM - Physical Collocation Agreement Sec. 1.4; AT&T Appendix - Collocation Sec. 4.7)

22. As of December 31, 1997, five CLECs had been provided with collocation spaces in 11 different central office buildings in Oklahoma. A total of 15 collocation spaces occupying 2,900 square feet of floor space have been provided to these carriers. Within the five-state area served by SWBT, 25 CLECs have been provided with collocation space in 56 different central office buildings. A total of 85 collocation spaces have been provided.
23. The SONET-Based Interconnection arrangement is similar to the Virtual Collocation arrangement, except that both the CLEC and SWBT will install SONET-based equipment in their respective locations and each can choose the SONET equipment vendor of their choice. All of the same options for service configurations exist for this arrangement as with the Virtual Collocation Interconnection. The FCC tariff rate will be applied in accordance with ¶ 826 of the FCC Order. (STC Sec. II.B.3; ACS, Cox, ICG and Interprise Sec. 4.3.3; Intermedia and USLD Sec. II.B.3)
24. If a CLEC has no cable facilities of its own available for interconnection, it can lease special access, DS1 or DS3 facilities from SWBT. If the CLEC already has a facility collocated in a SWBT central office for other purposes, it can use the spare capacity of that facility for local exchange interconnection. 47 C.F.R. § 51.323(g) (STC Appendix UNE Sec. 8.2.1.1; AT&T, Dobson and Sprint Attachment UNE Sec. 8.2.1.1)
25. SWBT and a CLEC may mutually agree to utilize another interconnection method when it is determined to be technically feasible. (STC II.B.4; ACS Cox and Interprise Sec. 4.3.6; Brooks Sec. II.B.5; ICG Sec. 4.3.5; Intermedia Sec. II.B.6; USLD Sec. II.B.4)

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26. The access SWBT provides to points of interconnection will be equal in quality (as defined by 47 C.F.R. § 51.331) to what SWBT provides to itself, except where requested otherwise, and will meet the same technical criteria and standards used in SWBT's network for comparable arrangements. 47 U.S.C. § 251(c)(2)(C); 47 C.F.R. § 51.305(a)(3),(4) (STC II.B.4)
27. Interconnection at all points and using all methods available is provided under nondiscriminatory and reasonable terms and at the same level of quality that SWBT provides comparable interconnections to itself and its affiliates. 47 U.S.C. § 251(c)(2)(C) and (D) These equal quality interconnections are achieved through the use of the same facilities, interfaces technical criteria and service standards as SWBT applies to itself. Order ¶ 224 (STC II.B.4) During the fourth quarter of 1997, the average blocking to SWBT trunk groups was 0.27 percent (or a 99.73 percent completion rate). Data was also available for the CLEC trunk groups for this same period. The blocking rate for CLEC trunk groups was 0.03 percent (or a completion rate of 97.97 percent.) These results were measured on 29,967 SWBT trunks and 3,099 CLEC local trunks in Oklahoma. The measured blocking occurred on a single CLEC trunk group in October and November of 1997. There was no blocking on any CLEC trunk group in December 1997. The above standard of interconnection fulfills SWBT's obligations under Section 271 (c)(2)(B)(i) and 251(c)(2)(B) and (C) to interconnect with other carriers at a level of quality that is at least equal to what SWBT provides itself.
28. Additional information concerning the number of interconnection arrangements requested in Oklahoma is contained in the Affidavit of Mr. Charles Cleek.

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### Trunking Arrangements

#### CLEC Originating (CLEC to SWBT)

29. When SWBT has a combined local and access tandem in an exchange, intraLATA toll traffic may be combined with the local traffic on the same trunk group. When there are separate SWBT access and local tandems in an exchange, a separate local trunk group will be provided to the local tandem, and a separate intraLATA toll trunk group shall be provided to the access tandem. (STC Appendix ITR Sec. A.1; ACS, Cox and Interprise Appendix ITR Sec. I.A; AT&T, Dobson and Sprint Appendix ITR Sec. 2.1.1; Brooks, Intermedia and USLD Appendix ITR Sec. A.1; ICG Exhibit C Sec. A.1) This trunking arrangement was agreed to in a stipulation between AT&T and SWBT in Missouri and Texas.
30. When a CLEC interconnects directly to a SWBT end office, local traffic may be terminated over a direct trunk group to the end office; however, intraLATA toll traffic shall be provided over a separate trunk group to the SWBT access tandem. This trunk group shall be one-way outgoing only and can utilize either Multifrequency ("MF") or Signaling System 7 ("SS7") protocol signaling. 47 C.F.R. § 51.305(f) (STC Appendix ITR Sec. A.1; Brooks, Intermedia and USLD Appendix ITR Sec. A.1; ICG Exhibit C Sec. A.1)
31. SWBT allows interLATA traffic to be transported between the CLEC central office and the SWBT access tandem over a "meet point" trunk group separate from local and intraLATA toll traffic. The access toll-connecting trunk group can be established for the transmission and routing of Exchange Access traffic between the CLEC's end users and interexchange carriers via a SWBT access tandem. This trunk group may be set up as one-way or two-way and can utilize SS7 or MF signaling protocol. 47 C.F.R. § 51.305(f) (STC Appendix



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ITR Sec. A.2; ACS, Cox and Interprise Appendix ITR Sec. II; AT&T, Dobson and Sprint Appendix ITR Sec. 2.2; Brooks, Intermedia and USLD Appendix ITR Sec. A.2; ICG Exhibit C Sec. A.2)

32. If the CLEC chooses, additional trunk groups may be established for services such as 800 (888), E911, Mass Calling or Public Response Choke Networks, and Operator Services access. (STC Appendix ITR Sec. A.3-A.5; ACS, Cox and Interprise Appendix ITR Sec. III-VI; AT&T, Dobson and Sprint Appendix ITR Sec. 2.3-2.6; Brooks, Intermedia and USLD Appendix ITR Sec. A.3-A.5; ICG Exhibit C Sec. A.3-A.5)

### **CLEC Terminating (SWBT to CLEC)**

33. In Oklahoma, SWBT provides local traffic to the CLEC over a separate trunk group from the local tandem. SWBT may trunk directly to a CLEC from a SWBT end office. In those exchanges where SWBT has a combined local and access tandem, SWBT normally combines the local and IntraLATA toll traffic over a single trunk group to the CLEC. When SWBT has a separate access and local tandem in an exchange, a trunk group is established from each tandem to the CLEC. This trunk group(s) is one-way incoming only and can utilize either MF or SS7 protocol signaling. (STC Appendix ITR Sec. B.1; ACS, Cox and Interprise Appendix ITR Sec. I.B; AT&T, Dobson and Sprint Appendix ITR Sec. 2.1.2; Brooks, Intermedia and USLD Appendix ITR Sec. B.1; ICG Exhibit C Sec. B.1)) This trunking arrangement was agreed to in a stipulation between AT&T and SWBT in Missouri and Texas.
34. InterLATA traffic is transported from SWBT's access tandem over a separate trunk group from local and IntraLATA toll traffic. This trunk group may be set up as one-way or two-

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- way and can utilize either MF or SS7 protocol signaling. (STC Appendix ITR Sec. B.2; ACS, Cox and Interprise Appendix ITR Sec. II; AT&T, Dobson and Sprint Appendix ITR Sec. 2.2; Brooks, Intermedia and USLD Appendix ITR Sec. B.2; ICG Exhibit C Sec. B.2)
35. All trunk forecasting and servicing for the Local and IntraLATA Toll trunk groups is based upon the same industry standard objectives that SWBT uses for its own trunk groups. The standard objective of 2% overall blocking during the time-consistent average busy hour in the busy season consists of 1% blocking from the End Office to the Tandem and 1% blocking from the Tandem to the End Office, based on Neil Wilkinson B.01M (Medium Day-to-Day Variation). The objectives for various types of trunk groups are listed in the STC Appendix ITR Sec. D. (ACS, Cox and Interprise Appendix ITR Sec. VII; AT&T, Dobson and Sprint Appendix ITR Sec. 3; Brooks, Intermedia and USLD Appendix ITR Sec. D; ICG Exhibit C Sec. D)
36. SWBT is responsible for forecasting and servicing the trunk groups terminating to the CLEC. The CLEC is responsible for forecasting and servicing trunk groups used to terminate to SWBT end offices and/or transit, i.e., tandem, to other providers' networks, operator services, DA services and interLATA toll service. (STC Appendix ITR Sec. E; ACS, Cox and Interprise Appendix ITR Sec. VIII; AT&T, Dobson and Sprint Appendix ITR Sec. 4; Brooks, Intermedia and USLD Appendix ITR Sec. E; ICG Exhibit C Sec. E)
37. SWBT will use standard trunk traffic engineering methods as described in Bell Communications Research, Inc. document SR-TAP-000191, Trunk Engineering Concepts and Applications. This ensures that all interconnection trunking is managed in the same manner as SWBT does its own trunk groups. (STC Appendix ITR Sec. E; ACS, Cox and Interprise Appendix ITR Sec. VIII; AT&T, Dobson and Sprint Appendix ITR Sec. 4;

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Brooks, Intermedia and USLD Appendix ITR Sec. E; ICG Exhibit C Sec. E ) As stated in paragraph 27, above, in the fourth quarter of 1997 the blocking level of CLEC trunks was below that of the trunks used by SWBT for its own customers.

### **II. CHECKLIST ITEM (ii): NONDISCRIMINATORY ACCESS TO NETWORK ELEMENTS**

#### **General Unbundling Rules**

38. A BOC, such as SWBT, meets the requirements of the Checklist if it offers access and interconnection that includes:
- (ii) Nondiscriminatory access to network elements in accordance with the requirements of sections 251(c)(3) and 252(d)(1).
39. In its Order, the FCC identified a minimum list of network elements that must be provided on an unbundled basis. These include unbundled access to local loops, network interface devices, local and tandem switching capability, interoffice transmission facilities, signaling and call-related databases, operations support systems functions, and operator services and directory assistance facilities. Each of these will be discussed below.
40. SWBT must provide access to each network element on an unbundled basis; that is, without requiring the purchase of any other network element as a condition for the purchase of another. 47 C.F.R. § 51.307 SWBT is not allowed to impose limitations, restrictions or requirements on the request or the use of unbundled network elements that would impair the ability of a CLEC to offer a telecommunications service in the manner that it intends. 47 C.F.R. § 51.309 The network elements and the access to those elements must be equal in quality to that SWBT provides to itself. 47 C.F.R. § 51.311 In addition, the terms and conditions pursuant to which SWBT provides access to unbundled network

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elements must be offered equally to all requesting CLECs. 47 C.F.R. § 51.313 SWBT must also allow requesting CLECs to combine network elements. 47 C.F.R § 51.315 (STC Appendix UNE Sec. 2.6 ; ACS, Cox and Interprise Appendix UNE Sec. II.B; AT&T, Dobson and Sprint Attachment UNE Sec. 2.4; Brooks and USLD Appendix UNC; Intermedia Appendix UNE)

41. SWBT provides requesting CLECs with nondiscriminatory, unbundled access to network elements for use in providing telecommunications services to their customers. Access to network elements is provided on a nondiscriminatory and equal-in-quality basis under the same terms and conditions to all CLECs. Each of the above requirements will be discussed below. A discussion of how CLECs will be able to access the UNEs in order to combine them begins at Section VI of this affidavit. For information on the number of UNEs currently provided to CLECs in Oklahoma and the five-state SWBT service area, see the affidavit of Mr. Mike Auinbauh.
42. As required by 47 C.F.R. § 51.307, SWBT will provide to a requesting CLEC (for the provision of a telecommunications service) nondiscriminatory access to network elements on an unbundled basis at any technically feasible point. These network elements will provide the CLEC access to all features, functions and capabilities in a manner that allows the CLEC to provide any telecommunications service that the network element is capable of providing. 47 C.F.R. § 51.307(a), (c) (STC Appendix UNE Sec. 2.1 and 2.3; ACS, Cox and Interprise Appendix UNE Sec. II.A and II.C; AT&T, Dobson and Sprint Attachment UNE Sec. 2.1 and 2.3; Brooks and USLD Appendix UNC; Intermedia Appendix UNE)

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43. SWBT also provides access to the facilities or functionality of network elements separately from access to other network elements and for a separate charge. 47 C.F.R. § 51.307(d) (STC Appendices Pricing Schedule and UNE Sec. 2.2.4)
44. SWBT will provide CLECs access to the unbundled network elements to permit CLECs to combine such network elements with other network elements obtained from SWBT or with network components provided by the CLEC itself to provide telecommunications services to its customers, provided that such combination is technically feasible and would not impair the ability of other carriers to obtain access to other unbundled network elements or to interconnect with SWBT's network. 47 C.F.R. § 51.309(a) (STC Appendix UNE Sec. 2.2.6; ACS, Cox and Interprise Appendix UNE Sec. II.B; AT&T, Dobson and Sprint Attachment UNE Sec. 2.4; Brooks and USLD Appendix UNC; Intermedia Appendix UNE)
45. SWBT permits a CLEC to purchase unbundled network elements in order to provide exchange access service to itself in order to provide interexchange services to its customers, subject to the applicable charges. 47 C.F.R. § 51.309(b) (STC Appendix UNE 2.2.7)
46. Requesting CLECs are entitled to exclusive use of an unbundled network facility, and to the use of features, functions, or capabilities, for a set period of time. 47 C.F.R. § 51.309(c). However, SWBT retains ownership of the facility and retains the obligation to maintain, repair or replace unbundled network elements as necessary. (STC Appendix UNE Sec. 2.4; ACS, Cox and Interprise Appendix UNE Sec. II.G; AT&T, Dobson and Sprint Attachment UNE Sec. 2.7) Each network element provided by SWBT to all CLECs will meet applicable regulatory performance standards and be at least equal in quality and performance as that which SWBT provides to itself. 47 C.F.R. § 51.311(a), (b) (STC

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Appendix UNE Sec. 2.2.8; ACS, Cox and Interprise Appendix UNE Sec. II.Q; AT&T, Dobson and Sprint Attachment UNE Sec. 2.17.1)

47. The terms and conditions pursuant to which SWBT provides access to unbundled network elements will be offered equally to all requesting CLECs. 47 C.F.R. § 51.313(a) The STC contains the terms and conditions available to any and all CLECs. In addition the "Most Favored Nation" clause allows any CLEC to adopt the terms, conditions and prices of individual appendices to another CLEC's contract.
48. SWBT provides unbundled network elements in such a way that the CLEC may combine such network elements with other network elements obtained from SWBT, or with network components provided by itself. 47 C.F.R. § 51.315(a) (STC Appendix UNE Sec. 2.2; ACS, Cox and Interprise Appendix UNE Sec. II.B; AT&T, Dobson and Sprint Attachment UNE Sec. 2.4; Brooks and USLD Appendix UNC; Intermedia Appendix UNE)

## Unbundled Network Elements

49. As required by the Act and the FCC's Order, Southwestern Bell makes available nondiscriminatory access to the following core unbundled elements:
  - Local Loop
  - Network Interface Device
  - Local Switching Capability
  - Tandem Switching Capability
  - Interoffice Transmission Facilities
  - Signaling Networks and Call-Related Databases
  - Operations Support Systems Functions
  - Operator Services and Directory Assistance

47 C.F.R. § 51.319 (a) - (g) (STC Appendix UNE Sec. 3.0-10.0)

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50. Most of the minimum set of network elements are separately required by the checklist and therefore will be discussed in later sections of my affidavit. However, the Network Interface Device ("NID") will be discussed in this section. The Operations Support Systems Functions ("OSS") will be discussed in detail in the Affidavit of Ms. Elizabeth Ham.
51. The NID is a cross-connect device used to connect loop facilities to a customer's inside wiring. The NID contains connection points to which the service provider and the end-user customer each make their connections.
52. Where a CLEC provides its own loop facilities, the CLEC will provide its own NID and may interface to the customer's premises wiring through connections in the customer chamber of the SWBT NID. 47 C.F.R. § 51.319(2), (STC Appendix UNE Sec. 3.3; ACS, Cox and Interprise Appendix UNE Sec. IV.C; AT&T, Dobson and Sprint Attachment UNE Sec. 3.4)
53. CLECs may connect to the customer's inside wire at the SWBT NID, as is, at no charge. Any repairs, upgrades, disconnects or rearrangements required by the CLEC will be performed by SWBT based on time and material charges. (STC Appendix UNE Sec. 3.2; ACS, Cox and Interprise Appendix UNE Sec. IV.B; AT&T, Dobson and Sprint Attachment UNE Sec. 3.2)
54. Where a CLEC obtains local loops as an unbundled network element from SWBT, SWBT will provide the NID. SWBT will connect the drop wire between the distribution plant facilities and the NID at no additional charge to the CLEC.

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55. At multiple dwelling units or multiple-unit business premises, it is normally expected that the CLEC will provide its own NID and will connect directly with the customer's inside wire without any requirement to connect to the SWBT NID. In those situations where it is necessary to relocate or rearrange the SWBT NID to allow access to the customer's inside wiring, such rearrangements or relocations will be charged to the CLEC on a time-and-materials basis. (STC Appendix UNE Sec. 3.4; ACS, Cox and Interprise Appendix UNE Sec. IV.D; AT&T, Dobson and Sprint Attachment UNE Sec. 3.5)

### **Bona Fide Request**

56. Upon request, SWBT will provide unbundled network elements, or modifications to previously identified network elements, to the extent technically feasible. The process to be used for developing the requested arrangement is called the Bona Fide Request (i.e., Special Request) process. (STC Appendix UNE Sec. 2.13; ACS, Cox and Interprise Appendix UNE Sec. III; AT&T Attachment UNE Sec. 2.21; Dobson and Sprint Attachment UNE Sec. 2.19)
57. A Network Element Bona Fide Request will contain a written technical description of the requested Network element, the date when the element is requested to be available and the projected quantity of interconnection points. SWBT will provide the requesting CLEC an acknowledgment of the request within 10 days of its receipt and a preliminary analysis of the request within thirty days. If the element is already operational (i.e., is currently being provided as a network element to another requesting carrier) SWBT will furnish a price quote within the same ten-day period. If the requested UNE is not operational, SWBT and the CLEC will, within ten days, mutually develop a schedule and procedures for processing the request. Under ordinary circumstances, the schedule should not exceed 90 days. (STC



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Appendix UNE Sec. 2.13.1-2.13.5; ACS, Cox and Interprise Appendix UNE Sec. III.C-III.F; AT&T Attachment UNE Sec. 2.21.2-2.21.5; Dobson and Sprint Attachment UNE Sec. 2.19.2-2.19.5)

58. If SWBT's analysis or the request reveals that access to the network element is not technically feasible and/or that the request does not qualify as a network element that is required to be provided under the 1996 ACT, SWBT will notify the CLEC within 30 days of the request. (STC Appendix UNE Sec. 2.13.4; ACS, Cox and Interprise Appendix UNE Sec. III.I; AT&T Attachment UNE Sec. 2.21.8; Dobson and Sprint Attachment UNE Sec. 2.19.8)
59. If the requesting CLEC does not agree with the terms, conditions, or price of a requested Network Element, they may seek arbitration by the OCC pursuant to § 252 of the Act. (STC Appendix UNE Sec. 2.13.7; ACS, Cox and Interprise Appendix UNE Sec. III.K; AT&T Attachment UNE Sec. 2.21.10; Dobson and Sprint Attachment UNE Sec. 2.19.10)

### III. CHECK LIST ITEM (iv): LOCAL LOOP

60. The local loop network element is defined as a transmission facility between a distribution frame (or its equivalent) in an incumbent LEC central office and an end user customer premises. The loop terminates in the NID at the customer's premises. 47 C.F.R. § 51.319(a) (STC Appendix UNE Sec. 4.1; ACS, Cox and Interprise Appendix UNE Sec. V.A; AT&T, Dobson and Sprint Attachment UNE Sec. 4.1; Brooks and USLD Appendix UNC; Intermedia Appendix UNE)
61. SWBT provides the following standard local loops as network elements unbundled from local switching or other services: 47 U.S.C. §271(c)(2)(b)(iv)

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- 2-Wire analog loop supporting analog voice frequency, with no more than 8 dB loss
- 4-Wire analog loop
- 2-Wire digital loop (160 Kilobits per second) to support Basic Rate Integrated Services Digital Network based services
- 4-Wire digital loop (1.544 Megabits per second) to support DS1 services including Primary Rate ISDN services

SWBT also offers a standard conditioning option on the 2-wire analog loop to reduce loss to no more than 5 dB. (STC Appendix UNE Sec. 4.2; ACS, Cox and Enterprise Appendix UNE Sec. V.B; AT&T, Dobson and Sprint Attachment UNE Sec. 4.2; Brooks and USLD Appendix UNC; Intermedia Appendix UNE)

62. Information concerning the number of loops provided to CLECs in Oklahoma and SWBT's five-state operating area is contained in the affidavit of Mr. Mike Auinbauh.
63. A CLEC may request, and to the extent technically feasible, SWBT will provide access to additional loop types and conditioning pursuant to the Bona Fide Request (i.e., Special Request) process. (STC Appendix UNE Sec. 4.3; AT&T, Dobson and Sprint Attachment UNE Sec. 4.3)

## IV. CHECKLIST ITEM (v): LOCAL TRANSPORT

64. Local transport, also known as interoffice transmission facilities, is defined as incumbent SWBT interoffice transmission facilities dedicated to a particular customer or carrier, or shared by more than one customer or carrier, that provides telecommunications between **SWBT central office switches or between a SWBT tandem switch and a SWBT central office**. Interoffice transport includes Common Transport, to the extent required (Ameritech Shared Transport Appeal) and Dedicated Transport. SWBT offers both Common Transport and Dedicated Transport to all CLECs. 47 U.S.C. § 271(c)(2)(B)(v)

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47 C.F.R. § 51.319(d) (STC Appendix UNE Sec. 8; ACS, Cox and Interprise Appendix UNE Sec. VIII; AT&T, Dobson and Sprint Attachment UNE Sec. 8; Brooks and USLD Appendix UNC; Intermedia Appendix UNE)

65. SWBT will be responsible for the engineering, provisioning, and maintenance of the underlying equipment and facilities that are used to provide Interoffice Transport. (STC Appendix UNE Sec. 8.0; ACS, Cox and Interprise Appendix UNE Sec. VIII.B; AT&T, Dobson and Sprint Attachment UNE Sec. 8.1 2)
66. Common Transport is a shared interoffice transmission path between SWBT switches. Common Transport will permit a CLEC to have calls switched using the Unbundled Local Switching element purchased from SWBT to other SWBT switches over SWBT's common transport network. Common Transport will also permit a CLEC to utilize SWBT's common transport network between a SWBT tandem and a SWBT end office switch. Common transport is provided in accordance with the Third Reconsideration Order and the revised 47 C.F.R. § 51.319(d)(12)(ii). (STC Appendix UNE Sec. 8.1; ACS, Cox and Interprise Appendix UNE Sec. VIII.C; AT&T, Dobson and Sprint Attachment UNE Sec. 8.1)
67. Dedicated Transport is an interoffice transmission path dedicated to a particular customer or CLEC that provides telecommunications between wire centers owned by SWBT or a CLEC. (STC Appendix UNE Sec. 8.2.1; ACS, Cox and Interprise Appendix UNE Sec. VIII.D; AT&T, Dobson and Sprint Attachment UNE Sec. 8.2)
68. SWBT will offer Dedicated Transport as a transmission path dedicated to a CLEC. The following transmission speeds will be available:

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- DS1 (1.544 Mb/s)
- DS3 (45 Mb/s)
- OC3 (155.520 Mb/s)
- OC12 (622.080 Mb/s)
- OC48 (2488.320 Mb/s)

(STC Appendix UNE Sec. 8.2.1.2; ACS, Cox and Interprise Appendix UNE Sec. VIII.D.3; AT&T, Dobson and Sprint Attachment UNE Sec. 8.2.1.3)

69. A Digital Cross-Connect System ("DCS") is an electronic device that provides the capability of rearranging circuits on high-speed facilities without the need to de-multiplex the signals. Without a DCS, signals cannot be exchanged between high-speed circuits without returning all of the circuits to analog electrical signals. SWBT will offer DCS in conjunction with the unbundled dedicated transport element with the same functionality that is offered to interexchange carriers. 47 C.F.R. § 51.319 (d)(2)(iv) (STC Appendix UNE Sec. 8.2.4; ACS, Cox and Interprise Appendix UNE Sec. VIII.E; AT&T, Dobson and Sprint Attachment UNE Sec. 8.2.3)
70. SWBT will provide the cross-connects necessary to extend Dedicated Transport facilities to points of access designated by the CLEC. 47 C.F.R. § 51.319(d)(2)(iii) (STC Appendix UNE Sec. 11.3.3; ACS, Cox and Interprise Appendix UNE Sec. XI.C.3; AT&T, Dobson and Sprint Attachment UNE Sec. 11.3.2)
71. To the extent required (Ameritech Shared Transport Appeal), SWBT's unbundled local transport will allow access to both shared and dedicated transport, including existing transmission facilities, features, functions and capabilities that a requesting CLEC could use in the transmission, routing or other provisioning of a telecommunications service. (47

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U.S.C. Sec.3, 29) In addition to the standard arrangements, the CLEC may request new or additional elements using the Bona Fide Request (i.e., Special Request) process. (STC Appendix UNE Sec. 2.16; ACS, Cox and Interprise Appendix UNE Sec. III; AT&T Attachment UNE Sec. 2.21; Dobson and Sprint Attachment UNE Sec. 2.19)

### V. CHECKLIST ITEM (vi): LOCAL SWITCHING

72. The Checklist (§ 271(c)(2)(B)(vi)) and the FCC Rules (47 C.F.R. § 51.319(c)) require SWBT to unbundle local switching from transport, local loop transmission or other services. The Rules also require unbundling of local and tandem switching capabilities, including trunk-connect facilities, including but not limited to, the connection between trunk termination at a cross-connect panel and a switch trunk card, the basic switching function of connecting trunks, and the functions that are centralized in tandem switches. 47 C.F.R. § 51.319(c)(2) SWBT satisfies these requirements. (STC Appendix UNE Sec. 5.0; ACS, Cox and Interprise Appendix UNE Sec. VI; AT&T, Dobson and Sprint Attachment UNE Sec. 5; Brooks and USLD Appendix UNC; Intermedia Appendix UNE)
73. SWBT offers a local switching element that encompasses line-side and trunk-side facilities plus the features, functions and capabilities of the switch. The line-side facilities include the connection between a loop termination at, for example, a main distribution frame, and a switch line card. 47 C.F.R. § 51.319(c)(1)(i)(A) (STC Appendix UNE Sec. 5.1; ACS, Cox and Interprise Appendix UNE Sec. VI.A; AT&T, Dobson and Sprint Attachment UNE Sec. 5.1)
74. The trunk-side facilities include the connection between, for example, trunk termination at a trunk-side cross-connect panel and a trunk card. 47 C.F.R. § 51.319(c)(1)(i)(B) (STC

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Appendix UNE Sec. 5.1; ACS, Cox and Interprise Appendix UNE Sec. VI.A; AT&T, Dobson and Sprint Attachment UNE Sec. 5.1)

75. The local switching element includes access to all features, functions and capabilities of the local switch, including but not limited to the basic switching and routing functions of connecting lines to lines, lines to trunks, trunks to lines and trunks to trunks. The local switching element includes the same capabilities that are available to SWBT customers, such as a telephone number, dial tone, signaling and access to 911, access to operator services and directory assistance, and access to features as required by state law. In addition, the local switching element includes all vertical features that the switch is capable of providing, including custom calling, CLASS features, and centrex-like features, as well as any technically feasible routing features. 47 C.F.R. § 51.319(c)(1)(i)(C) (STC Appendix UNE Sec. 5.1; ACS, Cox and Interprise Appendix UNE Sec. VI.A; AT&T, Dobson and Sprint Attachment UNE Sec. 5.1)
76. When a CLEC requests Unbundled Common Transport, SWBT's Local Switching element will route calls on SWBT's common transport network to the appropriate trunks or lines for call origination or termination. The CLEC is not required to purchase a trunk port for access to the common transport element. All routing to the common transport will be done using the existing SWBT switch routing table. (STC Appendix UNE Sec. 5.3; ACS, Cox and Interprise Appendix UNE Sec. VI.C)
77. Where a CLEC purchases Unbundled Local Switching and elects to route Directory Assistance and Operator Services to its customers through its own Directory Assistance and Operator Services platforms, SWBT will provide access to the local switch functionality and features required to route calls from the CLEC's customers to CLEC-

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designated trunks for the provision of CLEC Directory Assistance and Operator Services where technically feasible. (STC Appendix UNE Sec. 5.4; AT&T, Dobson and Sprint Attachment UNE Sec. 5.2.3)

78. SWBT will allow a CLEC to designate the features and functions that are to be activated on a particular unbundled switch port to the extent that such features and functions are available. This will be done using the same service order process as is used by SWBT. (STC Appendix UNE Sec. 5.8; ACS, Cox and Interprise Appendix UNE Sec. VI.G; AT&T Attachment UNE Sec. 5.2.13; Dobson and Sprint Attachment UNE Sec. 5.2.11)

79. Access to unbundled local switching is provided through switch ports. The following switch ports are available to all CLECs:

- Analog Line Port: A line-side switch connection available in either loop or ground start signaling configurations used primarily for switched voice communications.
- ISDN Basic Rate Interface Port: A line-side switch connection which provides ISDN Basic Rate Interface based capabilities.
- ISDN Primary Rate Interface Trunk Port: A trunk-side switch connection which provides Primary Rate Interface ISDN Exchange Service capabilities.

(STC Appendix UNE Sec. 5.9; ACS, Cox and Interprise Appendix UNE Sec. VI.H; AT&T, Dobson and Sprint Attachment UNE Sec. 5.3)

80. SWBT's unbundled tandem switching element meets all requirements of the FCC's Rules. Included are trunk-connect facilities, including, but not limited to the connection between trunk termination at a cross-connect panel and a switch card, the basic switching function of connecting trunks to trunks, and all technically feasible functions that are centralized in tandem switches (as distinguished from separate end-office switches), including but not limited to call recording, the routing of calls to operator services, and signaling conversion

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features. 47 C.F.R. § 51.319(c)(2) (STC Appendix UNE Sec. 6.0 ACS, Cox and Interprise Appendix UNE Sec. VII; AT&T, Dobson and Sprint Attachment UNE Sec. 6.0)

81. CLECs may request SWBT to provide customized routing of calls to the CLEC's Operator Services and Directory Assistance ("OS/DA") platforms. Customized Routing permits a CLEC who uses SWBT's switch, either through Resale or UNE, to route its customers' local operator services and directory assistance calls to the CLEC's own OS/DA platform rather than use SWBT's Operator and Directory Assistance services. The FCC's Interconnection Order required that SWBT provide Customized Routing from "only those switches that are capable of performing customized routing." (§ 418) The FCC further defined that customized routing would enable CLECs to direct particular classes of calls to outgoing trunks which would permit the CLEC to self provide for select interoffice facilities, operator services and directory assistance. (Id.)
82. Customized Routing can be provided through the use of Line Class Codes (LCCs). LCCs are essentially a set of end office switch translations which provide instructions to the switch on call processing and routing for a particular service. However SWBT has developed an alternative Customized Routing method through the use of AIN technology. This AIN product is unprecedented and required a significant design and development effort by SWBT. The new product has been named Local Service Provider Routing Service (LRS). This new method of customized routing is currently available in all switches except the DMS-10 (5 switches) in Oklahoma. In the DMS-10 switches, the LCC method of customized routing is available.
83. A CLEC may request additional switching elements through the Bona Fide Request process.



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**VI. CLEC ACCESS TO COMBINE UNBUNDLED NETWORK ELEMENTS**

84. SWBT's STC offers five methods and conditions under which SWBT agrees to provide CLECs with access to SWBT UNEs for the provision of services to CLEC end users. These methods are intended to provide CLECs with access to the UNEs without compromising the security, integrity and reliability of the central office and the public switched telephone network, as well as minimize the potential service disruption to end users converting from service provided by SWBT to service provided by a CLEC through the use of UNEs. (STC, Appendix UNE 2.9)
85. CLECs may use the methods listed below to access and combine identified Unbundled Network Elements within SWBT Central Offices or Tandem Offices. The options listed below apply to local loops, local switching and dedicated transport. (STC Appendix UNE 2.9.1) These methods are fully explained in SWBT's Technical Publication, *CLEC's Technical Publication for Access to Unbundled Network Elements*, which is attached to my affidavit as (Deere) Schedule No. 1.
86. (Method 1) If a CLEC is physically collocated in a SWBT central office or tandem office, SWBT will extend UNEs that require cross connection to CLEC's physical collocation Point of Termination (POT) frame. Using this method, the CLEC has secure access to its circuits and they are protected from access by others. This option also allows cross connection to equipment provided by the CLEC in the collocation space. (STC Appendix UNE 2.9.1.1)
87. (Method 2) If a CLEC is physically collocated in a SWBT central office or tandem office, SWBT will extend UNEs that require cross connection to a CLEC UNE access point